



# INTERMEDIATE SMALL BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## PUBLIC DISCLOSURE

March 3, 2008

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The National Bank & Trust Company  
Charter Number: 1997

48 North South Street  
Wilmington, Ohio 45177

Office of the Comptroller of the Currency

Central Ohio Field Office  
325 Cramer Creek Court, Suite 101  
Dublin, Ohio 43017

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

**INSTITUTION'S CRA RATING: This institution is rated Satisfactory.**

**The Lending Test is rated: Satisfactory.**

**The Community Development Test is rated: Satisfactory.**

- The majority of loans originated during the review period were from within the bank's two assessment areas (AA's).
- The National Bank & Trust Company's (NB&T's) loan-to-deposit ratio is reasonable.
- The bank's record of lending to borrowers of different incomes and businesses of different sizes reflects reasonable penetration in both AA's and is considered satisfactory.
- The geographic distribution of loans reflects reasonable penetration in both AA's and is considered satisfactory.

## **Scope of Examination**

This review of NB&T's CRA performance was conducted using intermediate small bank examination procedures. The last CRA examination was dated November 15, 2004, and the current review began March 3, 2008. With the exception of community development (CD) loans, the primary data for the Lending Test includes loans originated from January 1, 2006, to December 31, 2007. The evaluation period for the Investment Test, Service Test and Community Development loans is January 1, 2006 to March 1, 2008.

For the Lending Test, NB&T's originations of home mortgage loans, home improvement loans, and loans to small businesses and farms were evaluated.

For each assessment area (AA) we conducted separate analyses, based upon the availability of census and loan data. We utilized 2000 census data to analyze performance. Our analysis included all residential mortgage, small business and agricultural loan data submitted during the review period.

## **Description of Institution**

The National Bank and Trust Company (NB&T) is an independent intrastate community bank headquartered in Wilmington, Ohio, which is located 50 miles northeast of Cincinnati, Ohio. As of December 31, 2007, NB&T reported total assets of \$518 million and Tier 1 capital of \$55 million or 10.54% of total assets.

NB&T is a wholly owned subsidiary of NB&T Financial Group, Inc., a one-bank holding company also located in Wilmington Ohio. NB&T Insurance Agency, Inc., located in Wilmington, is a financial subsidiary of the bank. The results of our review did not indicate that the activities of the bank's subsidiary impact the bank's capacity and ability to lend or invest in its community. Therefore, the activities of NB&T Insurance Agency were not included in our assessment of NB&T's CRA performance.

NB&T offers a full range of consumer, commercial loan and deposit products, as well as trust services. As of December 31, 2007, the bank's loan portfolio totaled \$356 million. As demonstrated

by the following table, the bank's primary lending products are commercial loans, residential mortgage loans and consumer loans. NB&T's market area is comprised largely of rural markets. Competition for loans and deposits within the assessment areas (AA's) is strong and comes from both local community institutions as well as large regional institutions.

**Loan Mix**

<b>Loan type</b>	<b>\$ (000)</b>	<b>% by \$</b>	<b>Number of Loans</b>	<b>% by #</b>
Home Loans	32,075	24.00%	338	9.34%
Consumer Loans	26,396	19.75%	2,474	68.41%
Commercial Loans	60,957	45.60%	513	14.18%
Agricultural Loans	14,236	10.65%	292	8.07%
<b>Total</b>	<b>136,664</b>	<b>100%</b>	<b>3,617</b>	<b>100%</b>

Source: Bank's record of loans originated between January 1, 2006 – December 31, 2007

NB&T has 16 full service branches. One branch is located within an upper-income tract, 13 are located in middle-income tracts and two are in moderate-income tracts. NB&T has 14 ATM's located at the branches. Additionally, there are four stand-alone ATMs in middle-income tracts.

There are no legal, financial, or other factors impeding NB&T's ability to meet the credit needs of its AA. The bank's last CRA examination was conducted November 15, 2004 and resulted in a "Satisfactory" rating. The bank's two AA's comply with the requirements of the regulation. Refer to the below section for a description of the AA's and the bank's CRA Public File for additional information.

**Description of Assessment Area(s)**

NB&T has two AA's, the Cincinnati MSA AA and the Wilmington Non-MSA AA. The AA's meet the requirements of the regulation and do not arbitrarily exclude low- or moderate-income areas.

**The Cincinnati MSA 17140 AA (Cincinnati MSA AA)** includes Brown, Clermont and Warren Counties in Southeast Ohio. All counties in this AA are adjacent to Clinton County. The AA does not contain any low-income geographies.

Brown County is comprised of a total of eight census tracts. There are five-moderate income census tracts and three middle-income tracts in the county. NB&T has three branches in Brown County; two of the Brown County branches are in moderate-income tracts and one is in a middle-income tract.

Clermont County is comprised of 33 census tracts. There are six moderate-income, 22 middle-income, and five upper-income census tracts in the county. NB&T has four branches in Clermont County; all are located in middle income census tracts.

Warren County is comprised of 32 census tracts. Fifteen are upper-income tracts, 12 middle-income tracts, four moderate-income tracts and one tract has no income designation. NB&T has three

branches in Warren County; two branches are located in middle-income tracts and one branch is located in a moderate-income tract.

The population of the Cincinnati MSA AA is 378,645. The Housing and Urban Development updated median family income per the 2000 census data is \$64,600. Per year-end 2007 demographic information, employment conditions in the Cincinnati MSA AA are mixed, with Warren County's unemployment rate at 4.7%, Clermont County's unemployment rate 5.0% and Brown County's unemployment rate 6.5%. The Ohio average unemployment rate, as of December 2007, was 5.6%. Major industries in the AA are service, retail trade and construction.

**The Wilmington Non-MSA AA** includes Clinton and Highland Counties. The AA does not contain any low-income geographies.

Clinton County is the bank's primary market area and contains the bank's main office. NB&T ranks first in the county with a 5.45% deposit market share. The county is comprised of nine census tracts, eight middle-income tracts and one upper-income tract. NB&T has eight branches in the county; all located in middle-income tracts.

Highland County is comprised of nine census tracts. Eight are middle-income tracts and one is a moderate-income tract. NB&T has one branch in the county located in a middle-income tract.

The population of the Wilmington Non-MSA AA is 81,418. The Housing Urban Development 2007 updated non-MSA median family income is \$50,700. Employment conditions in the AA are mixed. Per the U.S. Department of Labor statistics, Clinton County's December 2007 unemployment rate was 5.0%, while the unemployment rate for Highland County was 6.5%. The Ohio average unemployment rate as of December 2007 was 5.6%. Major industries in the AA are manufacturing, state and local government and retail trade. Major employers in the AA are ABX Air Inc., Wal-Mart Stores Inc., Ahresty Wilmington Corporation, Batavia Transmissions and R&L Carriers.

Two community contacts with a local community development corporation and a community service organization were conducted as part of this CRA examination. The individuals contacted were complimentary of NB&T's involvement in the local community as well as meeting the community's credit needs. Primary credit needs in the community are affordable housing, first time homebuyers programs and small business loans.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

NB&T's lending performance is satisfactory.

To evaluate NB&T's CRA lending performance, we focused on its: record of lending in its AA, loan-to-deposit ratio since the last CRA examination, including a comparison to similarly situated institutions, record of lending to borrowers of different incomes and businesses/farms of different sizes, and the geographic distribution of lending in the bank's two AA's.

## **Loan-to-Deposit Ratio**

- NB&T's loan-to-deposit ratio is reasonable.

The average loan-to-deposit ratio for the 16 quarters since the last CRA examination of 88.35% is reasonable. A review of eight similarly situated institutions located within NB&T's AA's revealed a range of loan-to-deposit ratios from 66% to 100%. Of the eight institutions, NB&T ranked fourth when comparing the banks' loan-to-deposit ratios.

## **Lending in Assessment Area**

- The majority of NB&T's lending activity occurs within the bank's two AA's.

We evaluated the bank's record of lending within its two AA's. Our analysis of the bank's lending which included residential real estate loans (home purchase, home improvement and refinance), as well as small business loans and agriculture loans, determined that a majority of the bank's loans were originated from within the bank's AA. Our review revealed that between January 1, 2006 and December 31, 2007, 79% of all loans were originated within the bank's AA's. This level represents a majority of the bank's lending within the bank's AA's. See Table 1 in the Appendix section for details.

## **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

- NB&T's borrower distribution reflects an overall reasonable dispersion and satisfactory performance.

### **Cincinnati MSA AA:**

- The distribution of loans by income level is reasonable in the Cincinnati MSA AA.

### **Borrower distribution of home purchase loans in the Cincinnati MSA AA**

NB&T's borrower distribution of home purchase loans in the Cincinnati MSA AA meets the standard for reasonable penetration. Analysis of 2000 census data and home purchase loans originated during the review period revealed that NB&T's percentage of home purchase loans made to low-income borrowers in the AA of 7.41% lags the percentage of low-income families in the Cincinnati MSA AA of 15.91%. However, the bank's record of home purchase loans to moderate-income borrowers of 25.93% exceeds the percentage of moderate-income families in the Cincinnati AA of 18.15%. Factors which may contribute to a lower level of lending of home purchase loans to low-income families in the AA include seven percent of all households in the AA being below the poverty level coupled with the median home price of \$124,412. (See Table 2 in the Appendix for details on facts and data used to evaluate home purchase lending in the AA.)

### **Borrower distribution of home improvement loans in the Cincinnati MSA AA**

NB&T's borrower distribution of home improvement loans in the Cincinnati MSA AA meets the standard for reasonable performance. NB&T's record of home improvement lending to low-income

borrowers exceeds the percentage of low-income families in the AA while the percentage of home improvement loans to moderate-income families is significantly lower than the percentage of moderate-income families in the AA. (See Table 3 in the Appendix for details.)

**Borrower distribution of home mortgage refinance loans in the Cincinnati MSA AA**

NB&T's borrower distribution of home mortgage refinance loans in the Cincinnati MSA AA is reasonable. For both low- and moderate-income borrowers the bank's record of home mortgage refinance loans is slightly lower than the percentage of low-income and moderate-income families, respectively, in the AA. (See Table 4 in the Appendix for details.)

**Borrower distribution of business and farm loans in the Cincinnati MSA AA**

NB&T's borrower distribution of business and farm loans reflects excellent penetration. The percentage of NB&T's business loans originated in the Cincinnati MSA AA to businesses reporting annual revenues of less than \$1 million was 94%, significantly exceeding the percentage of businesses in the AA that reported revenues of \$1 million or less (62%). Additionally, in the Cincinnati MSA AA 100% of the bank's agricultural loans were to farms reporting revenues of less than \$1 million. (See Tables 5 and 6 in the Appendix for details.)

**Wilmington Non-MSA AA:**

- NB&T's borrower distribution reflects excellent dispersion in the Wilmington Non MSA AA and exceeds the standard for satisfactory performance.

**Borrower distribution of home purchase loans in the Wilmington Non MSA AA**

NB&T's borrower distribution of home purchase loans in the Wilmington Non MSA AA, meets the standard for reasonable performance. The bank's record of home purchase loan originations to low- and moderate-income borrowers is less than the percentage of low and moderate-income families, respectively, in the AA. Contributing factors to lower penetration to low-income borrowers include 11% of the families in the Wilmington Non MSA AA living below the poverty level combined with the median home price in the AA being \$88,881. (See Table 2 in the Appendix for facts and data used to evaluate home purchase lending in the AA.)

**Borrower distribution of home improvement loans in the Wilmington Non MSA AA**

NB&T's record of home improvement lending in the Wilmington Non MSA AA reflects excellent penetration. The percentage of home improvement loans to low-income borrowers significantly exceeds the percentage of low-income families in the AA. Additionally, the percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income borrowers in the AA. (See Table 3 for details.)

**Borrower distribution of home mortgage refinance loans in the Wilmington Non MSA AA**

NB&T's borrower distribution of home mortgage refinance loans exceeds the standard for reasonable performance. NB&T's record of home mortgage refinance lending to low-income borrowers approximates the percentage of low-income families in the AA, while the record of lending to moderate-income families exceeds the percentage of families in the AA. (See Table 4 for details).

### **Borrower distribution of business and farm loans in the Wilmington Non MSA AA**

NB&T's percentage of the bank's loans to small businesses in the Wilmington Non-MSA AA of (82%) significantly exceeded percentage businesses in the AA reporting revenues of \$1 million or less (58%) and exceeds the standard for reasonable performance. For agricultural loans in the Wilmington Non-MSA AA, 99% of all farm loans were to farms reporting revenues of less than \$1 million, which is reflective of excellent distribution. (See Table 6 in the Appendix for details.)

### **Geographic Distribution of Loans**

- NB&T's lending to geographies of different income levels within its AA's is reasonable and reflective of satisfactory performance.

### **Cincinnati MSA AA;**

- The distribution of loans in the Cincinnati MSA AA by income level of the geography is reasonable. While the bank's performance for geographic distribution of home purchase loans does not meet the standard for reasonable dispersion, the excellent dispersion noted in home improvement, home mortgage refinance and business and farm lending warrant an overall rating of reasonable for this portion of the lending test for the Cincinnati MSA AA.

### **Geographic distribution of home purchase loans in the Cincinnati MSA AA**

NB&T's geographic distribution of home purchase loans in the Cincinnati MSA AA in moderate-income geographies is significantly lower than the percentage of owner-occupied units in moderate-income geographies (7.41% vs. 17.04%) and does not meet the standard for reasonable dispersion. (See Table 7 in the Appendix for details.)

### **Geographic distribution of home improvement loans in the Cincinnati MSA AA**

NB&T's geographic distribution of home improvement loans reflects excellent dispersion throughout the bank's Cincinnati MSA. The percentage of home improvement loans originated in moderate-income geographies (38%) significantly exceeds the percentage of owner-occupied units in moderate-income geographies (17%). (See Table 8 in the Appendix for details.)

### **Geographic distribution of home mortgage refinance loans in the Cincinnati MSA AA**

NB&T's geographic distribution of home mortgage refinance loans exceeds the standard for satisfactory performance. The bank's percentage of home mortgage refinance loans in moderate-income tracts in the Cincinnati MSA AA (26%) exceeds the percentage of owner-occupied units in moderate-income tracts in the AA (17%). (See Table 9 in the Appendix for details.)

### **Geographic distribution of loans to businesses and farms in the Cincinnati MSA AA**

NB&T's geographic distribution of small loans to businesses and farms in the Cincinnati MSA AA is excellent and exceeds the standard for satisfactory performance. The bank's percentage of small loans to businesses in its Cincinnati MSA AA moderate-income geographies (21.63%) is greater than the percentage of businesses located in moderate-income geographies (16.56%). Additionally, the percentage of small loans to farms in the Cincinnati MSA AA moderate-income geographies (32.00%) is significantly greater than the percentage of farms in located in moderate-income

geographies of the Cincinnati MSA AA (23.25%). (See Tables 10 and 11 in the Appendix for details.)

### **Wilmington Non MSA AA**

- NB&T's geographic distribution of loans in the Wilmington Non MSA AA is reasonable.

#### **Geographic Distribution of home purchase loans in the Wilmington Non MSA AA**

NB&T's geographic distribution of home purchase loans in moderate-income geographies in the Wilmington Non MSA AA is reasonable. The percentage of home purchase loans originated in the moderate-income geography is slightly lower than the percentage of owner occupied units in the moderate-income geography (2.22% vs. 5.95%) and meets the standard for satisfactory performance. (See Table 7 in the Appendix for details.)

#### **Geographic distribution of home improvement loans in the Wilmington Non MSA AA**

NB&T's geographic distribution of home improvement loans in the Wilmington Non MSA AA reflects poor dispersion and does not meet the standard for satisfactory performance. (See Table 8 in the Appendix for details.)

#### **Geographic distribution of home mortgage refinance loans in the Wilmington Non MSA AA**

NB&T's geographic distribution of home mortgage refinance loans is reasonable and meets the standard for satisfactory performance. The percentage of home improvement loans originated in the moderate-income geography of the Wilmington Non-MSA AA (4.48%) is slightly less than the percentage of owner-occupied units in the moderate-income tract (5.95%). (See Table 9 in the Appendix for details.)

#### **Geographic Distribution of small loans to businesses and farms in the Wilmington Non MSA AA**

NB&T's geographic distribution of small loans to businesses and farms in the Wilmington Non-MSA AA is reasonable and meets the standard for satisfactory performance. The bank's percentage of small loans to businesses in the moderate-income tract in its Wilmington Non-MSA AA of 1.09% is slightly below the percentage of businesses in the moderate-income geography in the AA of 2.69%. Additionally, the percentage of small loans to farms originated in the bank's single moderate-income geography of 0.71% is slightly below the percentage of small farms located in the single moderate-income geographic in the AA of 1.40%. (See tables 10 and 11 in the Appendix for details.)

### **Responses to Complaints**

NB&T has not received any written complaints regarding its performance meeting the credit and deposit needs of its AA's during the evaluation period.



## **COMMUNITY DEVELOPMENT TEST**

NB&T's community development performance demonstrates adequate responsiveness to the community development of its assessments areas.

The evaluation period for Community Development loans, investments and services was January 1, 2006 to March 1, 2008.

### **Number and Amount of Community Development Loans**

No community development loans were submitted for consideration in rating the bank's CRA performance for the evaluation period.

### **Number and Amount of Qualified Investments**

The number and amount of qualified investments is satisfactory. During 2006 in the Cincinnati MSA AA, NB&T made 17 qualified donations totaling \$34,145 to community development organizations. In the Wilmington Non-MSA AA, NB&T made 28 qualified donations totaling \$19,115 in 2006.

During 2007 in the Cincinnati MSA AA NB&T made 27 qualified donations totaling \$27,720. In the Wilmington Non-MSA AA, NB&T made 24 qualified donations totaling \$13,680 in 2007.

### **Extent to Which the Bank Provides Community Development Services**

NB&T's performance in regards to community development services is satisfactory. During 2006 and 2007, NB&T's officers and directors dedicated 3,353 hours and employees dedicated an additional 5,621 volunteer hours participating in civic, non-profit and community activities. The majority of those hours were targeted towards organizations whose primary mission is to benefit low-moderate income individuals or small businesses in the bank's AA's.

### **Responsiveness to Community Development Needs**

The adequacy of NB&T's responsiveness to the community needs of its community is demonstrated via its CD investments and services. During the evaluation period, NB&T made numerous donations to local organizations whose mission is to provide assistance to low- and or moderate-income families. Additionally, bank employees and officers perform volunteer work with various community agencies whose primary purpose is assistance to low- and moderate-income families. NB&T has 16 full-service branches and 14 ATMs. NB&T also offers on-line banking providing customer access to consumer and business accounts as well as telephone banking capabilities to customers. While neither of the bank's AA's contains any low-income geographies, the bank's Cincinnati MSA AA contains five moderate income census tracts and the Wilmington Non-MSA AA contains one moderate-income geography. Two of the bank's branches located in the Cincinnati MSA AA are located in moderate-income geographies both are full service branches. There are no full service branches located in the moderate-income tract in the Wilmington Non-MSA AA.

## **Fair Lending or Other Illegal Credit Practices Review**

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

APPENDIX A

**Table 1. - Lending in Wilmington Non MSA AA & Cincinnati MSA AA**

Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total #	Inside		Outside		Total \$
	#	%	#	%		\$	%	\$	%	
Residential Real Estate	265	84.39	49	15.91	314	23,873	79.36	6,208	20.64	30,081
Small Business	392	79.67	100	20.33	492	42,452	72.91	15,777	27.09	58,229
Agriculture	190	72.80	71	27.20	261	6,452	54.78	5,325	45.22	11,777
Totals	847	79.38	220	20.62	1,067	72,777	72.71	27,310	27.29	100,087

Source: HMDA & CRA loan data submitted for loans originated between January 1, 2006 December 31, 2007.

**Table 2. - Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE												Geography: CINCINNATI MSA AA & WILMINGTON NON MSA AA				
Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2007																
Metropolitan Area (MA)/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upper	
<b>Full Review:</b>																
Cincinnati MSA AA	27	37.50	15.91	7.41	18.15	25.93	23.86	29.63	42.09	37.04	0.10	0.00	0.16	0.18	0.00	
Wilmington Non MSA AA	45	62.50	17.80	11.11	18.31	8.89	24.42	24.22	39.46	55.56	1.37	2.07	0.54	1.30	1.00	

\* Based on 2006 Peer Mortgage Data (CE)

\*\* As a percentage of loans with borrower income information available.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

**Table 3. - Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT															
Geography: WILMINGTON MSA AA & WILMINGTON NON MSA AA															
Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2007															
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upper
<b>Full Review:</b>															
Wilmington non-MSA AA	29	53.70	15.91	31.03	18.15	20.69	23.86	24.14	42.09	24.14	0.59	2.40	0.37	0.52	0.35
Cincinnati MSA AA	25	46.30	17.80	24.00	18.31	4.00	24.42	32.00	39.46	40.00	2.05	0.00	0.00	1.47	3.61

\* Based on 2006 Peer Mortgage Data (CE)

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

**Table 4. - Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: WILMINGTON MSA AA & WILMINGTON NON MSA AA				
Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2007																
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upper	
<b>Full Review:</b>																
Wilmington non-MSA AA	72	51.80	15.91	15.28	18.15	26.39	23.86	20.83	42.09	37.50	0.36	0.41	0.34	0.28	0.41	
Cincinnati MSA AA	67	48.20	17.80	11.94	18.31	13.43	24.42	28.36	39.46	46.27	2.07	1.09	0.60	2.16	3.01	

\* Based on 2006 Peer Mortgage Data (CE)

\*\* As a percentage of loans with borrower income information available.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

**Table 5 - Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: WILMINGTON MSA AA & WILMINGTON NON MSA AA				
Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2007									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Cincinnati MSA AA	208	53.06	62.45	94.23	69.71	17.79	12.50	1.00	2.49
Wilmington – Non MSA AA	184	46.94	58.10	81.29	74.46	17.39	8.15	6.28	10.85

\* Based on 2006 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2007).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

**Table 6 - Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS					Geography: WILMINGTON MSA AA & WILMINGTON NON MSA AA				
Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2007									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Cincinnati MSA AA	50	26.32	96.84	100.00	94.00	4.00	2.00	20.81	24.12
Wilmington – Non MSA AA	140	73.68	99.07	99.29	95.71	2.86	1.43	31.77	33.46

\* Based on 2006 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2007).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 7. - Geographic Distribution of Home Purchase Loans**

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE						GEOGRAPHY: WILMINGTON MSA & WILMINGTON NON MSA									
EVALUATION PERIOD: JANUARY 1, 2006 TO DECEMBER 31, 2007															
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	Overall	Low	Mod	Mid	Upper
<b>Full Review:</b>															
Cincinnati MSA AA	27	37.50	0.00	0.00	17.04	7.41	50.96	70.37	32.20	22.22	0.08	0.00	0.06	.13	0.04
Wilmington Non-MSA AA	45	62.50	0.00	0.00	5.95	2.22	87.82	93.33	6.23	4.44	1.15	0.00	1.41	1.22	0.00

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.



**Table 8. - Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT												Geography: WILMINGTON MSA & WILMINGTON NON MSA				
Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2007																
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upper	
<b>Full Review:</b>																
Cincinnati MSA AA	29	53.70	0.00	0.00	17.04	37.93	50.76	51.72	32.20	10.34	0.58	0.00	1.37	0.43	0.42	
Wilmington Non MSA AA	25	46.30	0.00	0.00	5.95	0.00	87.82	96.00	6.23	4.00	2.00	0.00	0.00	2.40	0.00	

\*Based on 2006 Peer Mortgage Date (CE)

\*\*Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\*Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census Information.

**Table 9. - Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: WILMINGTON MSA & WILMINGTON NON MSA				
Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2007																
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total**	% Owner Occ Units®	% BANK Loans	% Owner Occ Units®	% BANK Loans	% Owner Occ Units®	% BANK Loans	% Owner Occ Units®	% BANK Loans	Overall	Low	Mod	Mid	Upper	
<b>Full Review:</b>																
Cincinnati MSA AA	72	51.80	0.00	0.00	17.04	26.39	50.76	62.50	32.20	11.11	0.29	0.00	0.19	0.47	0.09	
Wilmington Non MSA AA	67	48.20	0.00	0.00	5.95	4.48	87.82	88.06	6.23	7.46	1.68	0.00	1.43	1.69	1.61	

\*Based on 2006 Peer Mortgage Date (CE)

\*\*Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

@ Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census Information.

**Table 10. - Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: WILMINGTON MSA & WILMINGTON NON MSA				
Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2007																
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total**	% of Businesses@	% BANK Loans	% of Businesses@	% BANK Loans	% of Businesses@	% BANK Loans	% of Businesses@	% BANK Loans	Overall	Low	Mod	Mid	Upper	
<b>Full Review:</b>																
Cincinnati MSA AA	208	53.06	0.00	0.00	16.56	21.63	49.78	61.06	33.63	17.31	1.00	0.00	1.95	1.32	0.40	
Wilmington Non MSA AA	184	46.94	0.00	0.00	2.69	1.09	91.28	76.63	6.03	22.28	6.28	0.00	1.75	6.10	11.67	

\*Based on 2006 Peer Small Business Data – US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

@ Source Data – Dun and Bradstreet (2007)

**Table 11. - Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2007															
Geography: WILMINGTON MSA & WILMINGTON NON MSA															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upper
<b>Full Review:</b>															
Wilmington non-MSA AA	50	26.32	0.00	0.00	23.25	32.00	52.27	64.00	24.48	4.00	20.81	0.00	27.78	22.83	6.25
Cincinnati MSA AA	140	73.68	0.00	0.00	1.40	0.71	86.16	67.86	12.44	31.43	31.77	0.00	16.67	27.66	61.11

\* Based on 2006 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2007).

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